

REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-11 and 13-23 are pending in the present application. Claims 1, 22 and 23 are amended by the present response. Support for amendments to the claims can be found in the disclosure as originally filed, for instance, on page 33, lines 17-24. Thus, no new matter is added.

In the outstanding Office Action, Claims 1-11 and 13-23 were rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement; Claims 1-9, 11 and 13-23 were rejected under 35 U.S.C. §102(a) as anticipated by Matsushima (U.S. Pat. App. No. 2002/0054397); and Claim 10 was rejected under 35 U.S.C. §103(a) as unpatentable over Matsushima in view of Kimura (U.S. Pat. No. 6,226,097).

With respect to the rejection of Claims 1-11 and 13-23 under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement, Applicants respectfully traverse this rejection as improper.

For instance, amended Claim 1 recites “the launch selection information indicating at least a location of an auxiliary storage device that stores one or more applications.” This feature is clearly supported throughout the specification. For example, page 20, lines 4-5 states “...reads the launch selection data 211, and determines a medium from which the external application is launched.” Further, page 28, lines 22-25 states “...checks setting information of the launch selection data 211 to determine a medium or mediums from which the external application 117 is launched in step S702.” Page 34, lines 10-15 states “...according to the compound machine 100 of the first embodiment, the external application launch part 131 selects one of the HDD 103 or the IC card 240 or both of them as a location or as locations from which one or more applications are launched for the compound machine

100.” Clearly the launch selection information includes information on the location of the auxiliary storage devices of the HDD 103 and IC card 240 that store the external applications.

In addition, with regard to the term “auxiliary”, page 4, beginning at line 12 states

As to the new compound machine, it is necessary to install the external application into the compound machine after the compound machine is shipped separately from the existing applications, in which the existing applications relates to image forming processes such as copying, printing, scanning and faxing installed before the compound machine is shipped. In addition, it is necessary to launch the installed external applications.

However, it is generally difficult to embed the external application in the nonvolatile memory after the shipment of the compound machine. Therefore, it can be considered to use an IC card such as a flash card or a hard disk device as a storing area for the external application.

MPEP §2163.02 states that the “objective standard for determining compliance with the written description requirement is, “does the description clearly allow persons of ordinary skill in the art to recognize that he or she invented what is claimed.” *In re Gosteli*, 872 F.2d 1008, 1012, 10 USPQ2d 1614, 1618 (Fed. Cir. 1989).”

One with ordinary skill in the art would clearly understand the term “auxiliary” to mean “extra” or “in addition to” the main nonvolatile memory where the OS and system applications are stored.

In addition, MPEP §2163 states “the subject matter of the claim need not be described literally (i.e., using the same terms or *in haec verba*) in order for the disclosure to satisfy the description requirement.”

In addition, with regard to the phrase “the auxiliary storage device corresponding to a recording medium removable from the image forming apparatus without disassembling any other portion of the image forming apparatus.” Applicants note that one with ordinary skill in the art would clearly understand this phrase to mean a medium that can be removed without disassembling the image forming device such as a removable IC card. In other words, if the

image forming device has to be taken apart to remove the medium then such a device would not correspond.

Accordingly, Applicants respectfully request that the rejection of Claims 1-11 and 13-23 under 35 U.S.C. §112, first paragraph be withdrawn.

Addressing now the rejection of Claims 1-11 and 13-23 under 35 U.S.C. §102(a) over Morita, that rejection is respectfully traversed.

Amended Claim 1 recites

An image forming apparatus that includes service modules for performing system side processes on image formation, wherein applications can be added to the image forming apparatus separately from the service modules, the image forming apparatus comprising:

an application launch part configured to access launch selection information, the launch selection information indicating at least a location of an auxiliary storage device that stores one or more applications, and configured to launch the one or more applications from the auxiliary storage device according to the accessed launch selection information,

wherein the service modules are stored in a memory distinct from the auxiliary storage device.

Claim 22 recites similar features and Claim 23 recites at least the above noted features.

Matsushima describes an image processing device that includes a CD-ROM 17, a CPU 11 and a HDD 15. In addition, Matsushima describes that the control program for the image processing device is installed to the HDD 15.

However, Matsushima does not describe or suggest an application launch part configured to access launch selection information, the launch selection information indicating at least a location of an auxiliary storage device that stores one or more applications, and configured to launch the one or more applications from the auxiliary storage device according to the accessed launch selection information, where the service modules are stored in a memory distinct from the auxiliary storage device, as is recited in Claim 1.

The outstanding Action states on page 5 that the auxiliary storage device recited in Claim 1 is equivalent to the CD-ROM 17, optical disks or floppy disks described in paragraph [0048] of Matsushima. In addition, the outstanding Action states that the launching of the “reprint application” in paragraph 0103 of Matsushima is equivalent to the launching of the applications from the auxiliary storage device recited in Claim 1. However, Applicants note that the “reprint application” is clearly not described as being executed from the CD-ROM 17, optical disks or floppy disks in Matsushima.

In addition, the HDD 15 of Matsushima also cannot be interpreted as being equivalent to the auxiliary storage device of Claim 1, as the HDD 15 of Matsushima is described as including the control program which is obviously a service module that performs system side processes and Claim 1 recites that the service modules are stored in a memory that is distinct from the auxiliary storage device.

Further, Matsushima does not describe or suggest launch selection information that indicates at least a location of an auxiliary storage device that stores one or more applications, as is recited in Claim 1. The outstanding Action has cited paragraph 0096 of Matsushima as describing the “launch selection information,” however, Applicants note that the command dispatcher module 129b that is described in this paragraph does not ***indicate a location of an auxiliary storage device that stores an application***. Instead this element is described as performing a process of selecting an application from a number of applications that are all stored in the same location. Thus, Applicants respectfully submit that the features described in paragraph 0096 cannot be used to anticipate the claimed invention.

Accordingly, in light of the above noted discussion, Applicants respectfully submit that Claim 1, and similarly Claims 22 and 23, patentably distinguish over Matsushima.

In addition, the further cited Kimura reference does not cure the above noted deficiencies of Matsushima with respect to the above noted features.

Accordingly, Applicants respectfully submit that Claims 1, 22 and 23, and claims depending therefrom, patentably distinguish over Matsushima and Kimura considered individually or in combination.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance.

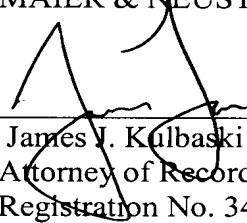
Respectfully submitted,

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